

REMARKS

Allowable claim 18 is amended to recite the subject matter of the base and intervening claims except for that of original claim 17, which is placed into new claim 21 depending from claim 18. Claim 21 thus includes all of the subject matter of original claim 18 and therefore should be allowable. Amended claim 18 recites all the explicitly structural features of original claim 18, omitting only a scanning direction. Amended claim 18 is submitted to be allowable because it recites a lengthwise channel, which is not seen in either of the applied references.

New dependent claim 22 is supported in the specification at page 11, line 7. It is patentable for the reasons below.

The amendment to claim 8, reciting a one-piece, integral, unitary cover member, is supported by cross-sectional cross-hatching in the drawing. The specification is amended to support the literal claim language. The other amendment to claim 8, reciting that the cell is pressure-tight, is supported at page 16, line 10, which describes an adjustable pressure inside the cell. Clearly, if the cell were not pressure-tight then the pressure would always be atmospheric, and therefore it would not be adjustable, contrary to what is disclosed. Therefore, it is pressure-tight.

In response to the outstanding Office action:

Claims 1-3, 5, 7-11, and 14-16 were rejected under §102 over Rainer, DD '448. This rejection is respectfully traversed.

Rainer does not disclose the feature now recited in claim 8, namely, a one-piece, integral, unitary cover member, which has the advantage of being leakproof and simple. There is no one-piece, integral, unitary member in Rainer that forms an open reservoir, as does the Applicants' cover member. Element 14 of Rainer, relied upon in the Office Action as the open reservoir, is a 'pressure equalizing and storage arrangement' (Druckausgleichs – und Speichereinrichtung), and

is shown by a conventional symbol for the same in the drawings, resembling an open reservoir that could be used for such a purpose, but is connected to the cover (Ring 9) via opening (Oeffnung) 11 and is not formed by the upper surface thereof as claimed.

Furthermore, there is no indented gutter channel at the planar bottom surface of an open reservoir formed by such a one-piece, integral, unitary member, as new claim 22 recites.

Claims 1-17 and 19-20 were rejected under §102 over Bleeker, US '692. This rejection is respectfully traversed.

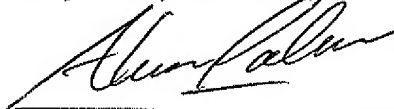
Bleeker's dish 12 does not form a pressure-tight workpiece cell, as the Applicants claim. Bleeker moves the dish 12, which it refers to as an "isolator" (Abstract), along with the projection system; the purpose is mechanical isolation of the projection system from viscous fluid forces (col. 3, lines 43-48). This is completely different from the Applicants' object and claimed subject matter, as set out in the instant specification (page 15, line 12): "the enclosed immersion fluid 19 contained within workpiece cell 8 moves with the unit, thus minimizing fluid flow at the working surface boundary of wafer 2. In this manner, the present invention substantially eliminates cavitation and other bubble forming stimuli at the wafer surface."

It is noted that Bleeker would have great difficulty in achieving a pressure-tight workpiece cell, because Bleeker teaches that its dish 12 must move relative to the substrate.

It is submitted that this application is in condition for allowance. Such action and the passing of this case to issue are requested. Should the Examiner feel that a conference would help to expedite the prosecution of this application, the Examiner is hereby invited to contact the undersigned counsel to arrange for such an interview.

April 2, 2007
Date

Respectfully submitted,



Alun Palmer (Reg. No. 47,838)
RABIN & BERDO, P.C.
CUSTOMER NO. 23995
Telephone: (202) 371-8976
Telefax : (202) 408-0924

ALP/NSB/atl